

Lisa J. Ludwig, OSB #95338
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Attorney for Defendant Gregory Paccone, Jr.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	
)	CR No. 11-91-BR-1
Plaintiff,)	
)	
vs.)	DECLARATION OF LISA J. LUDWIG
)	IN SUPPORT OF DEFENDANT'S
GREGORY PACCONE, JR.,)	UNOPPOSED MOTION TO
)	CONTINUE TRIAL DATE
Defendant.)	
)	

I, Lisa J. Ludwig, declare the following to be true to the best of my knowledge:

1. On June 17, 2011 I was appointed to represent Defendant Gregory Paccone, Jr. in the above captioned matter. I make this declaration in support of Mr. Paccone's contemporaneously filed motion to continue the August 23, 2011 trial date.

2. On February 25, 2011, the Government obtained an indictment charging Mr. Paccone with Felon in Possession of a Firearm in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), Distribution of Methamphetamine in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B), Distribution of Cocaine in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C), Manufacture of Cocaine Base in The Form of Crack Cocaine in violation of Title 21, United States Code, Section

841(a)(1) and 841(b)(1)(C). Docket #1. Mr. Paccone made his first appearance in this matter on June 29, 2011. Docket #12. Mr. Paccone is currently out of custody on order of the Court. Docket #14.

3. By the accompanying motion, Mr. Paccone requests that the current August 23, 2011 trial date be continued for at least sixty (60) days.

4. A continuance is needed because defense counsel and Mr. Paccone are still reviewing evidence, researching factual and legal issues presented by this case, and gathering additional materials in preparation for possible plea negotiations or trial.

5. I have communicated with Assistant U.S. Attorney Scott Kerin. On behalf of the Government, Mr. Kerin does not object to an extension of the defendant's trial date.

DATED this 11th day of August, 2011.

/s/ Lisa J. Ludwig

Lisa J. Ludwig, OSB #95338

Tel: (503) 223-5570

Attorney for Defendant Gregory Paccone, Jr.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF COUNSEL IN SUPPORT OF DEFENDANT'S UNOPPOSED MOTION TO CONTINUE TRIAL DATE on:

Scott Kerin
Assistant U.S. Attorney
U.S. Attorney's Office
1000 S.W. Third Ave., Suite 600
Portland, Oregon 97204

Attorney for Plaintiff United States

by electronic case filing.

DATED this 11th day of August, 2009.

/s/ Lisa J. Ludwig

Lisa J. Ludwig, OSB #98335
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Attorney for Defendant Gregory Paccone, Jr.